

To: Froede, Carl[Froede.Carl@epa.gov]
Cc: Jones, Connie[Jones.Constance@epa.gov]
From: Amoroso, Cathy[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C5033745779E4121B626D62341A9B89C-AMOROSO, CATHY]
Sent: Fri 2/19/2021 3:40:44 PM (UTC)
Subject: RE: ORR EIT 2/18/21 Takeaways
73212 EMDF ROD EPA TDEC 10 09 2019.pdf

Roger said there was a prior agreement that EPA and TDEC will have extra time to review the D1 ROD, and won't be limited to the standard review timeline.

I found this statement in the Oct 9 2019 joint EPA TDEC letter to DOE:

Because of the number of unresolved issues (e.g. WAC, *PNCA*, PDAS, LFRG review) the EPA and TD • C may request additional time to review the D 1 ROD, as was discussed and agreed to by DOE at the June 7, 2019 meeting between the parties.

I don't know if that agreement is documented elsewhere. We will need the FFA managers to ensure all parties are on the same page regarding review timeframe. Any D1 submitted in March will be very draft and necessarily be missing the effluent discharge limits, and may also be missing the final WAC and final info on how Hg discharges to the creek will be handled.

From: Froede, Carl <Froede.Carl@epa.gov>
Sent: Friday, February 19, 2021 5:56 AM
To: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Subject: RE: ORR EIT 2/18/21 Takeaways

If DOE submits the ROD in March/April then we will be in "dispute" by May due to the time constraints imposed by the FFA. That is a stupid idea and clearly outside the intent of the FFA process.

From: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Sent: Thursday, February 18, 2021 5:46 PM
To: Froede, Carl <Froede.Carl@epa.gov>
Cc: Jones, Connie <Jones.Constance@epa.gov>; Richards, Jon M. <Richards.Jon@epa.gov>
Subject: ORR EIT 2/18/21 Takeaways

Carl,
FYI

Some takeaways related to the EMDF from the EIT discussion today:

- UCOR said they would provide information about the EMDF waste water management system. I asked for such info to be shared with the EMDF ROD Project Team.
- The DRAT members would benefit from a summary of pertinent existing information/data for Bear Creek.
- At the next EMDF ROD Project Team meeting, Brad will float two ideas related to seasonal adjustment and methodology for groundwater contours (linear interpolation or other).
- Roger will follow up on how DOE plans to meet the 35 day FFA commitment related to the FFS.
- EIT needs to address heretofore TBD topic of whether public notice is appropriate for actual discharge limit numbers.
- DOE plans to submit the D1 ROD for EMDF late March/early April.

Also, as you and I discussed last week, we will need contract support and Jon's involvement with the WAC issues.

Thanks!
Cathy